

**REMARKS/ARGUMENTS**

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith, which place the application into condition for allowance. The present amendment is being made to facilitate prosecution of the application.

**I. STATUS OF THE CLAIMS AND FORMAL MATTERS**

Claims 1-25 are pending in this application. Claims 1, 6, 12, 17, 23, 24 and 25 are independent. Claims 24 and 25 are hereby amended. Changes to claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicants are entitled.

The Title is hereby amended.

**II. REJECTIONS UNDER 35 U.S.C. §101**

Claims 24 and 25, which were rejected under 35 U.S.C. §101, are hereby amended. Thus, Applicants submit the rejection has been overcome.

**III. REJECTIONS UNDER 35 U.S.C. §102(b)**

Claims 1-3, 6-8, 11-14, 17-19 and 22-25 were rejected under 35 U.S.C. §102(b) as allegedly anticipated by U.S. Patent No. 5,805,799 to Fredrickson et al.

Independent claim 1 recites, *inter alia*:

“...said memory interface unit includes a cryptosystem unit and said cryptosystem unit executes processing in which an integrity check value based on actual data to be stored in the actual data part is generated in response to a data-writing command from said control unit to said data storage means, and is stored in the redundant part.” (emphasis added)

As understood by Applicants, U.S. Patent No. 5,805,799 to Fredrickson et al. relates to a data integrity code including logical block address ("LBA") and circuit implementation. The code and implementing circuitry are utilized to enable data block LBA verification during a block transfer and retrieval process. The data integrity code has embedded LBA information and also serves as a crosscheck code used to detect miscorrection by an error correction code ("ECC"). Data integrity/cross-check redundancy with LBA is appended to data blocks transmitted to a buffer memory and verified after the data block has been transferred from the buffer. (See Abstract)

Applicants submit that the cited portions of U.S. Patent No. 5,805,799 to Fredrickson et al. (hereinafter, merely "Fredrickson") does not disclose or suggest the above-identified features of claim 1.

Specifically, Applicants submit that Fredrickson does not disclose or suggest that the cryptosystem unit executes processing in which an integrity check value based on actual data to be stored in the actual data part is generated in response to a data-writing command from said control unit to said data storage means, as recited in claim 1. Therefore, Applicants submit that claim 1 is patentable.

Independent claims 6, 12, 17, 23, 24 and 25 are similar in scope and believed to be patentable for similar reasons.

#### **IV. REJECTIONS UNDER 35 U.S.C. §103(a)**

Claims 4, 5, 9, 10, 15, 16, 20 and 21 were rejected under 35 U.S.C. §103(a) as allegedly unpatentable over U.S. Patent No. 5,805,799 to Fredrickson et al in view of U.S. Patent No. 6,252,961 to Hogan.

Claims 4, 5, 9, 10, 15, 16, 20 and 21 depend on one of the independent claims discussed above and are therefore believed to be patentable for at least the reasons provided in relation to the related independent claim.

As understood by Applicants, U.S. Patent No. 6,252,961 to Hogan relates to a drive such as a DVD-ROM drive that encrypts an error code correction (ECC) block in a manner that retains the error correction capabilities of the ECC block. The encryption is performed by generating an encryption mask including a plurality of random numbers and redundancy data.

Applicants submit that nothing has been found in the cited portions of U.S. Patent No. 6,252,961 to Hogan that would provide the disclosure lacking in Fredrickson.

## **V. DEPENDENT CLAIMS**

The other claims in this application are each dependent on claim 1, discussed above, and are therefore believed patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

## **CONCLUSION**

In the event the Examiner disagrees with any of statements appearing above with respect to the disclosures in the cited references, it is respectfully requested that the Examiner specifically indicate those portions of the reference, or references, providing the basis for a contrary view.

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In view of the foregoing amendments and remarks, it is believed that all of the claims in this application are patentable and Applicants respectfully request early passage to issue of the present application.

Respectfully submitted,  
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